

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TIMOTHY KLICK,	§	
Individually and On Behalf of All	§	Civil Action No. 4:19-cv-01583
Others Similarly Situated	§	
<i>Plaintiff,</i>	§	
v.	§	
	§	
CENIKOR FOUNDATION	§	
<i>Defendant.</i>	§	

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**DEFENDANT CENIKOR FOUNDATION’S  
RESPONSE TO PLAINTIFF’S MOTION FOR A STATUS HEARING**

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Defendant Cenikor Foundation does not object to Plaintiffs’ request for a status hearing; however, Plaintiff’s counsel did not confer with Cenikor’s counsel concerning availability for a status hearing beginning the week of October 7, 2024 before it filed its Motion despite Local Rule 7.1(d). All four of Cenikor’s Locke Lord counsel are directly and substantially involved in preparation for, and will be present live at, a trial in Tulsa, Oklahoma set to begin on Tuesday, October 15, 2024 in *William A. Grubb v. DXP Enterprises, Inc.*, Case No. 4:19-cv-00443-JH-JFJ in the United States District Court for the Northern District of Oklahoma. Counsel anticipates that trial will last at least through Friday, October 18, 2024 and will likely continue on into the week starting Monday, October 21, 2024.

Because of pretrial deadlines and trial preparation in the afore-mentioned case and other ongoing matters, Cenikor’s counsel has very limited availability between October 7, 2024, which is the week before trial, and October, 15, 2024, which is the start of trial that could last early into the week of October 21, 2024. Accordingly, Cenikor respectfully requests that a status hearing be scheduled no earlier than Friday, October 25, 2024.

Respectfully submitted,

/s/ David M. Gregory

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**Of Counsel for Defendant**

**Certificate of Service**

I hereby certify that on September 17, 2024 a true and correct copy of this document was served on all counsel of record in the consolidated cases via ECF filing in accordance with the Federal Rules of Civil Procedure.

/s/ Andrew W. Reed  
Andrew W. Reed